

SEALED**FILED**

OCT 19 2023

Mark C. McCartt, Clerk
U.S. DISTRICT COURTIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Case No. 23 CR 333 GKF

Plaintiff,

FILED UNDER SEAL

v.

INDICTMENTAARON MICHAEL THOMAS,
DARREN DOIL MEANS,[COUNTS ONE through THREE:
21 U.S.C. §§ 331(a) and 333(a)(2) –
Introduction of a Misbranded Drug
into Interstate Commerce;
Forfeiture Allegation: 18 U.S.C.
§ 982(a)(7) – Drug Forfeiture]

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about January 10, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, caused the introduction of, and caused the delivery of a misbranded drug, gabapentin, for introduction into interstate commerce, which drug was misbranded pursuant to Title 21, United States Code, Section 352(a), because its labeling was false and misleading, and pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use.

All in violation of Title 21, United States Code, Sections 331(a) and 333(a)(2).

COUNT TWO
[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about March 2, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, caused the introduction of, and caused the delivery of a misbranded drug, xylazine, for introduction into interstate commerce, which drug was misbranded pursuant to Title 21, United States Code, Section 352(a), because its labeling was false and misleading, and pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use.

All in violation of 21 U.S.C. §§ 331(a) and 333(a)(2).

COUNT THREE
[21 U.S.C. §§ 331(a) and 333(a)(2)]

On or about August 15, 2023, in the Northern District of Oklahoma and elsewhere, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, with intent to defraud and mislead, introduced, delivered for introduction, caused the introduction of, and caused the delivery of a misbranded drug, pregabalin, for introduction into interstate commerce, which drug was misbranded pursuant to Title 21, United States Code, Section 352(a), because its labeling was false and misleading, and pursuant to Title 21, United States Code, Section 352(f)(1), because its labeling failed to bear adequate directions for use.

All in violation of 21 U.S.C. §§ 331(a) and 333(a)(2).

FORFEITURE ALLEGATION
[18 U.S.C. § 982(a)(7)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(7).

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **AARON MICHAEL THOMAS** and **DARREN DOIL MEANS**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations of federal law.

All pursuant to Title 18, United States Code, Section 982(a)(7).

CLINTON J. JOHNSON
United States Attorney



NATHAN E. MICHEL
Assistant United States Attorney

A TRUE BILL

s/ Grand Jury Foreperson
Grand Jury Foreperson